

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

JEAN SCHLACHER,)	
)	08 C 2844
Plaintiff,)	
)	Judge Shadur
v.)	
)	Magistrate Judge Nolan
LAW OFFICES OF PHILLIP J. ROTCHE &)	
ASSOCIATES, P.C.)	
)	
Defendant,)	

**PLAINTIFF TERI SCHLACHER'S
ACCEPTANCE OF DEFENDANT'S RULE 68 OFFER OF JUDGMENT**

NOW COMES, Plaintiff Jean Schlacher ("Plaintiff Jean") in order to resolve this dispute arising out of abusive conduct that inflicted upon her undue stress, anxiety, and lost sleep, in order to provide her with peace of mind now and not at a future date, by and through her counsel, gives written notice of her acceptance of Defendant Law Office of Phillip J. Rotche & Associates, P.C. ("Rotche") Rule 68 Offer of Judgment, as follows:

1. Plaintiff Jean accepts individually, \$4,000 in statutory and actual damages as provided for in paragraph 1 of Rotche's Rule 68 Offer of Judgment.
2. Plaintiff Jean accepts reasonable attorney's fees and costs incurred as of the date of the Offer of Judgment to be determined by the Court in paragraph 2 of Rotche's Rule 68 Offer of Judgment.
3. A copy of Rotche's Rule 68 Offer of Judgment to Jean is attached hereto as Appendix 1.

WHEREFORE, Plaintiff Jean requests:

- a. That the Clerk of the Court to enter a Judgment in this matter against Defendant Rotche in the amount provided in paragraph 1.
- b. For the Court to determine and enter an award of reasonable attorney's fees and costs as to the prosecution of Plaintiff Jean's claims.

Respectfully submitted,

s/ Curtis C. Warner
Curtis C. Warner

Curtis C. Warner
Warner Law Firm, LLC
155 N. Michigan Avenue, Suite 737
Chicago, Illinois 60601
(312) 238-9820 (TEL)

APPENDIX 1

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

Jean Schlacher,)	
)	
Plaintiff,)	
)	Case No. 08 CV 2844
v.)	
)	
Law Offices of Phillip Rotche & Associates,)	Judge Shadur
)	Magistrate Judge Nolan
Defendant.)	
)	
)	

OFFER OF JUDGMENT

Pursuant to Rule 68 of the Federal Rules of Civil Procedure, Defendant, Law Offices of Phillip Rotche & Associates, P.C., by its attorneys, David M. Schultz and Corinne C. Heggie, hereby offers to allow judgment to be entered against it in this action, as follows:

1. Plaintiff Jean Schlacher, individually, to recover \$4,000 in statutory and actual damages.
2. Plaintiff Jean Schlacher to recover reasonable attorneys fees and costs incurred to date to be determined by the Court.
3. If this offer is not accepted as provided by Rule 68, it shall be deemed withdrawn and evidence thereof shall not be admissible except in the proceeding to determine costs.
4. If the judgment finally obtained by the plaintiff is not more favorable than the offer, the plaintiff must pay the costs incurred after the making of the offer.
5. This offer remains open for the ten (10) day period of time provided for in Fed.R.Civ.P. 68 and as calculated by the Federal Rules of Civil Procedure.

THE LAW OFFICE OF PHILLIP ROTCHE
& ASSOCIATES, P.C.

By: 
One of the attorneys for the Defendant

David M. Schultz
Corinne C. Heggie
HINSHAW & CULBERTSON LLP
222 North LaSalle Street, Suite 300
Chicago, Illinois 60601-1081
312/704-3000

**IN THE UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

JEAN SCHLACHER,)	
)	08 C 2844
Plaintiff,)	
)	Judge Shadur
v.)	
)	Magistrate Judge Nolan
LAW OFFICES OF PHILLIP J. ROTCHE &)	
ASSOCIATES, P.C.)	
)	
Defendant,)	

CERTIFICATE OF SERVICE

I, Curtis C. Warner, hereby certify that on August 11, 2008, I filed electronically

Plaintiff Jean Schlacher's Acceptance of Defendant's Rule 68 Offer of Judgment using the

Court's CM/ECF system, which automatically will send notice to those parties who have

appeared and are so registered to the following:

David M. Schultz
Corinne C. Heggie
Hinshaw & Culbertson LLP
222 No. LaSalle St., Ste. 300
Chicago, IL 60601-1081

Respectfully submitted,

s/ Curtis C. Warner
Curtis C. Warner

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